

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS.

SEP 22 2014

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTY CLERK

Courtney Fitzgerald Taylor

Plaintiff,

CASE NO. 2-14-CV-69

V.

Geo Group Inc, RICARDO MARTINEZ,  
GEORGE ZOLEY, RICHARD GLANTON,  
CLARENCE ANTONY, ANNE NEWMAN,  
CHRISTOPHER WHEELER, NORMAN CARLSON,  
JOHN HURLEY, ET, ALA.

CIVIL ACTION COMPLAINT.

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COMPLAINT

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HISTORY OF THE CASE I

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In October 2008 while living with his family in Phoenix, Arizona plaintiff Courtney Fitzgerald Taylor suffered gun shot wounds to several parts of his body as a result of his injury plaintiff was left with a colostomy and extreme damage to his Urethra requiring periodic visits to a Urologist. While waiting to have surgery done to said colostomy plaintiff was arrested and taken to a C.C.A. facility located in Florence, Arizona, then sentenced to 36 months in prison. He was then transferred to a G.E.O. facility in Pecos, Texas with a population of around 1300 inmates on 3-19-2013 upon plaintiff's arrival at this facility he was processed first by an officer and then went through a medical screening which revealed plaintiff's medical condition to the medical personnel on hand, and after speaking to and inquiring plaintiff later found out the person doing the screening was the H.S.A. for the medical department at the facility.

After informing and letting her see some of the different supplies that he had on his person up on arrival at the facility to his surprise the H.S.A. told plaintiff that she will not be purchasing any other products even after he told her his skin was sensitive to certain products so plaintiff had to use what was given to him by the medical department, and later brought a rash around the colostomy. After been placed in a cell with 39 other inmates no shower to deal with plaintiff's medical situation and no privacy to change and clean the colostomy when needed to plaintiff took a shower one morning and after being confronted by other inmates who became upset with him for using the shower in his condition plaintiff reported the matter to staff who in turn informed the medical department of how best to deal with this situation. A decision was then made to remove plaintiff from that unit and be placed in another unit with an African American inmate and then for him to shower in his unit and then come over to the medical building to change his bag and wafer in the restroom of the waiting area used by every other inmates who comes for their medical appointment, which was not even sanitize. After repeating this process for a while plaintiff became frustrated and informed the H.S.A. that what he was doing was not sanitary for his condition and demanded something be done to eliminate the situation. Plaintiff was then allowed to use a shower inside the building. After complaining for over 5 month's about the lack of medical supplies that were so desperately needed in order to stop the the human feces from leaking onto said person plaintiff had to jere-rigg what ever was provided to him so as to stop the smell coming from said colostomy along with feces which was pointed out to him by other inmates including one Ivan Lara Arguelles. Reg# 44419-177, who also witness the humiliation and embarrassment cause

by this situation. See Exhibit 1, and who himself had to call the attention of the officers in charge of the unit on more than one occasion for help when plaintiff passed out in the unit. Please See Exhibit 1 about the rigging of the supplies that were provided with institution grievance from.

#### HISTORY OF THE CASE II

Plaintiff was allowed to showers only 3 times per week, See Exhibit III. Plaintiff request to staff after using said shower for a while that there was no hot water and it took over 6 months all through the winter for the administration to get the situation resolved so plaintiff had to take freezing cold showers all this time. Please See Exhibit Iv.

Plaintiff also requested to staff for a medical mattress upon his arrival at this facility but was only given more suitable one 5 months after complaining about the pain and suffering he had being going through due to his medical condition. Please See Exhibit III inmate informal resolution form.

#### STATEMENT OF FACTS I

On or around January 28, 2012, Plaintiff was arrested for unrelated reasons, unfortunately while waiting for second surgery to close open colostomy, plaintiff was put on pretrial proceedings that led to a plea bargain agreement, the District Judge at plaintiff's attorney request ordered that plaintiff be sent to a medical facility operated by the F.B.O.P. furthermore the judge did not want to give any reduce time as he wanted plaintiff to get the second surgery done to close said colostomy.

#### STATEMENT OF FACTS II

On March 19, 2013, plaintiff was transfered to this Geo owned

and operated facility to serve the remainder of his sentence. Up on plaintiff's arrival during the medical screening plaintiff informed the prison authority that the Federal District Judge recommended he be sent to a medical facility where second surgery could be done. Plaintiff was given a laundry bag containing 3 tee shirts, 1 pair of shower shoes, 1 blanket, 2 bed sheets, 1 pillow case, 1 mattress, 1 pillow, 3 pairs of pants, 3 pairs of socks and 3 shirts then sent to a unit. After being given all these items plaintiff was never given any rags to take care of his medical situation. The third day after arriving here plaintiff went to prison officials to complain the reason for not been issued any rags and his condition is well known, he was then taken to the laundry department and to his surprise was given old towels and tee shirt used by other inmates that was cut into little pieces, plaintiff complained about the issuing of these items and was told to use them or do without. So from that day to the present the same practice has continued to be performed and said rags are not even sanitized.

#### STATEMENT OF FACTS.III

Several days after been at this facility plaintiff was called to see the on site Physician which is routine and was evaluated, a couple of months after plaintiff started to get severe cramps and pain to his abdomen and at the site of his stoma with said colostomy. He was taken to the medical building where he was given a kind of pain medication unknown to him which caused plaintiff to pass out in the unit and had to be taken by wheel chair to the medical building, then later found out said medication was too strong and from that day to the present is now been given a new medication called Tramadol. Plaintiff has since passed out on more than two other occasions.

After a couple of months plaintiff was sent to see an off-site Physician Generalist here in Pecos who runs a small Family practice. On February 19, 2014, plaintiff was taken to the Texas Tech Medical Facility in Odessa and met with a Dr. Salazar for what was told to plaintiff to be an evaluation for said colostomy surgery but even after a second visit nothing was done. Ever since plaintiff has not been to see any other General Surgeon or any other specialist. For the last 15 months plaintiff has been going through excruciating pain, diarrhea, lower mid abdominal cramps, loss of appetite and dehydration.

#### STATEMENT OF FACTS.IV.

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On August 11, 2014 while in the housing unit plaintiff was taken by an officer to the prison office complex placed in a cell and 30 minutes later to the solitary confinement unit without no incident report, no incident location and no charge. Plaintiff was then put in a small cell with another inmate and then forced to perform the daily routine of emptying his colostomy bag and removing of said bag to shower which not only causes embarrassment but also discomfort to plaintiff and the other inmate because of the foul odor that arise from said colostomy also plaintiff had to use un-sanitize shower to perform these acts. Plaintiff then went on a hunger strike to protest his wrongful detention in solitary confinement, but after 6 meals was taken to an interview room by a prison official and told if the hunger strike is discontinued plaintiff would be released after the Warden spoke to him, but after been seen by the Warden no such thing was done and prison officials failed to honour their promise and thus the unlawful imprisonment continued in 24 hour lock down. Because of the unfair punishment for not been charged with an offence and plaintiff medical condition, this living situation is not suitable and could cause

serious medical implication, these are clearly violation of his Constitutional Rights.

ARGUMENT I

For plaintiff's entire imprisonment at this Geo facility plaintiff's abuse has been outrageous and without any penological purpose as been locked down 24 hours with another inmate, denied access to recreational yard and not been given the proper supplies to take care of plaintiffs medical condition, but instead was given old and used towels left by other inmates that were cut into little pieces. Also there was no way of immediately disposing of plaintiffs bodily waste after taking a shower. Note that these pieces of rags are necessities, they are used to clean the open wound that plaintiff has. The Ramos Court explains that in order to provide minimal acceptable standard of Health Care aside from 40 hour a week of on site physician, there must be at least 4 hour a week from an Ear, Nose and a Throat Specialist and an Orthopedic Surgeon, none of the above existed at this facility operated by Geo Group Inc.

ARGUMENT II.

When given the first dose of pain medication plaintiff passed out in the unit, but when said medication was looked into it was discovered that medication was too strong for plaintiff so a different kind was given called Tramadol. Also there is only two qualified nurses at this facility. None of the foregoing would have been contemplated, let alone embrace as an integral and acceptable part of the everyday operation of the correctional facilities period. Never the less it is evidence by the millions of dollars that the Geo Group has to pay for civil rights abuse under the direction and management of the above defendants due to their policy of placing Corporate profits ahead of the health, safety and the constitutional rights of plaintiff and other federal inma

tes like plaintiff that they have under their custody and care.  
See, 436 US 658, 690-91 98 S. CT. 2018 2035-36 56 Led 2nd  
Cir. 1978.

### ARGUMENT III

The Eight Ammendment of the U.S Constitution prohibits cruel and unusual punishment, clearly plaintiff Courtney Fitzgerald Taylor was punished for no incident during his 9 days in solitary confinement. The action of this prison administration was inhumane and barbarous. Thus a violation of plaintiff's Eight Ammendment Constitutional Rights, see in Re Kemmler 136 U.S 436 (1890) see also Wilkerson V. Utah, 99 U.S. 13 (1878): Trop V Dulles, 356 U.S. 86 (1958); Robinson V. California, 370 U.S. 660 (1962): Weems V U.S. 217 U.S. 349 (1910). When the punishment is unnecessarily cruel in view of the purpose for which it is used.

The use of the isolated confinement is seen as a valid means of protecting the general prison population and for preventing disobedience, disorder or escape, plaintiff has done none of the above, but yet he has been confined in the special housing unit of the prison for 9 days in a living condition that is inhumane and cruel giving his medical condition, thus run a foul of the Eight Ammendment. Furthermore the process by which plaintiff's isolation was enforced was unfair thus violated due process of law.

See Mc Clary V. Coughlin, 87 F. Supp 2nd 205 (WDNY, 2000, Sub.App. 237 F.35 185) (2nd Cir. 2001)

### ARGUMENT IV

When the facts of the allegations are established it is then a matter of law as to whether the factual conditions are such that violation of the prohibition on cruel and unusual punishment exists. Plaintiff's condition at the SHU during the time had



becomes constitutionally intolerable. See Wright V. Mc Mann, 387.F 2nd 519 (2nd. Cir. 1967)

The unsanitary conditions of plaintiff Courtney Fitzgerald Taylor at the SHU for the time he was in solitary confinement was unnecessarily punitive in nature and violated also his Eight Amendment Rights. An inmate can not be placed in isolated confinement because he writes grivevance to stand for his constitutional rights. See Wojtczak W. Cuuler, 48 F. Supp 1288 (ED. PA 1979): Morgan V. Lavallee, 526 F. (2nd. Cir. 1975)

#### ARGUMENT V

A prison's disciplinary proceeding in which the inmate is not informed of the accusation against him does not comply with due process. In this case plaintiff was placed in the SHU without an incident report, no charge and above all no opportunity to be heard to confront alleged witnesses and to cross examine them. When there is no undue hazard to instutional safety or correctional goals the right to call witnesses and present documentary evidence is a must. If not the decision to not grant a witness request is denied, the reason for plaintiff been taken to the SHU was for writing letter's to THE ATTORNEY GENERALS OFFICE, THE DIRECTOR OF THE F.B.O.P and the A.C.L.U. to complain about the lack of medical care that this facility provides to not only himself but to other inmates which also caused the death of one such inmate on 8-10-2014, plaintiff complained on 8-11-2014 and was placed in the SHU. Please see exhibit of a copy of said letter and copies of certified receipts of time and mailing of said letter.



CONCLUSION I

A plaintiff under civil rights act is entitled to an award to monetary damages in order to repress deprivations of his constitutional rights. See, Wilson V. Prasse, 325 F. SUPP. 9(WD PA. 1971). In this case actual damages to compensate the plaintiff for out of pocket expenses and mental suffering as well as nominal and punitive damages to vindicate the malicious and intentional violations of plaintiffs rights.

CONCLUSION II.

Due to the foregoing plaintiff Courtney Fitzgerald Taylor brings this law suit against the following persons and entity both in their professional and personal capacities for compensatory, punitive and injunctive relief, Geo Group Inc, Ricardo Martinez, George Zoley, Richard Glanton, Clarence Antony, Anne Newman, Christopher wheeler, Norman Carlson, and John Hurley, and each for \$300,000.00 compensatory damages and \$700,000.00 in punitive damages. Plaintiff request for a jury trial discovery, witness, dispositions as this case involves medical and life safety issues that will also require expert witnesses testimony.

RESPECTFULLY SUBMITTED BY:

  
\_\_\_\_\_

R.C.D.C. III

P.O. Box 2038

Pecos, Texas 79772

Date: 8-28-2014

Rights of prisoners medical care book 1. chapter 3

Inadequate medical care will be seen as a constitutional violation if the medical need was a serious one but was not attended to.

I have found five reasons in this book that applies to my condition:

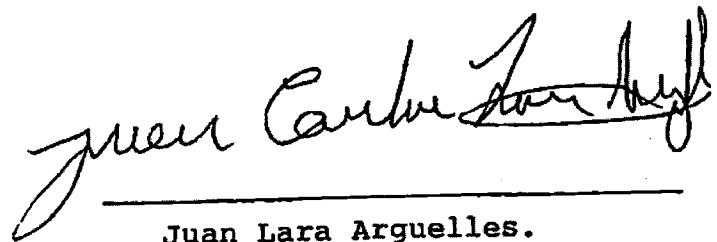
- a medical need is serious if it is diagnosed by a physician as a mandating treatment
- a need is serious if it is so obvious that even a lay person can easily recognize the necessity for a doctor's attention.
- \_ a medical need is serious if it causes pain.
- \_ if it affects a person's daily act it may be deemed serious.
- \_ if the condition offers the possibility of a life long handicap or permanent loss it may be considered serious.

Inmate need not wait untill harm occurs for a court to find that serious nedds are unmet.

Rights of prisoners medical care, Book I chapter 3 states that an insti-~~ti-~~tion should do a medical screening to inmate upon arrival at that facility to see if the inmate requires treatment or if that facility is capable of attending to the problem. Also that the systematic delays of weeks or months regardless of the severity of the needs is unacceptable.

A medical facility must have the proper medical equipment to attend to the inmates need which this facility does not have because it is not equipped for my condition meaning therefore, I should not have been here in the first place; even though, at sentecing the judge recommended that I go to a medical facility to receive the proper medical help that I need.

A couple of months ago I Juan Lara Arguelles #44419-177 was walking in my tank B-2 13- L which happens to be the same tank as Mr Courtney Fitzgerald Taylor when i noticed Mr Taylor was laying down on his bunk and waving at me to get my attention, i went over to him knowing of his medical situation as i was the same person who when he first got to this tank noticed something on his person and pointed it out to him and later found out he had a colostomy bag and it was leaking out human feces on his pants. I went over to assist him and he told me to get an officer for him as he was feeling dizzy and was in lot of pain. I went and press the intercom button located in the unit and told the officer that Mr Taylor was not feeling well, knowing that everyone at this facility knows of his medical condition i was shocked to see that it took almost two hours for them to get the medical staff to help Mr Taylor, who then came and took him away in a wheel chair to the medical building to render to him the help he needed.

A handwritten signature in black ink, appearing to read "Juan Lara Arguelles", is written over a horizontal line.

Juan Lara Arguelles.

Reg#44419-177

EXHIBIT I INSTITUTION GRIEVANCE FORM

# REEVES COUNTY DETENTION CENTER III INMATE INFORMAL RESOLUTION FORM

Date: 5/28/13 Informal Resolution No. RVS-13 42  
 From Taylor Courtney Fitgera BOP # 57155-053 Unit B2 4L  
 Last, First, Middle

## Part A-Inmate Request (Solicitud De Interno)

HSA, Pamela Nelson's reponce of 5/13/2013, is completely unresponcive to the substantive issue in my Cop-out, (inmate information request) of 5/10/2013, and this institution remains inviolation of the Americans with Disabilities Act. I, have a full colostomy and I, am being denied access to the right supplies to properly treat my condition. I, am being forced on many occassion to jere-rigg, the site of incition with tape and toilet paper to keep it from leaking because I, am being denied the right size bags, Human feces, is highly infectious and the foregoing is a serious health hazard

Date 5/28/13Signature [Signature]

## Part B- Response (Repuesta)

The Taylor at this time we are in the process of finding the correct size bag that will resolve this issue. With our recent conversation we will find what improved the leaking problem. Please watch the call out list.

Is inmate satisfied with response YES/NO, provided by Staff ?

Circle One

Date Returned to Inmate \_\_\_\_\_

Unit Staff Signature: [Signature]

L. Gutierrez, RN

Inmate Signature: \_\_\_\_\_

EXHIBIT I

MAY 28 2013

EXHIBIT II

# REEVES COUNTY DETENTION CENTER III

## INMATE INFORMAL RESOLUTION FORM

Date: 9-3-13 Informal Resolution No. RUS-13-63

From Taylor Fitzgerald Taylor BOP # 57155053 Unit B-2-46  
 Last, First, Middle

### Part A-Inmate Request (Solicitud De Interno)

From my first day at this facility to the present I have let the various personnel in charge about my medical problem and ask if I could obtain a medical mattress if not can I get a double a was told this facility does nothing of the kind. From that time to the present im having great difficulty getting out of bed in the mornings because of the pain that im experiencing to my Pelvis and back. Is there something that can be done to help this situation?

Date 9-3-13 Signature [Signature]

### Part B- Response (Repuesta)

your issue was formally resolved in person on 9-5-13

Is inmate satisfied with response YES/NO, provided by Staff ?  
 Circle One

Date Returned to Inmate \_\_\_\_\_ Unit Staff Signature: [Signature] 9/5/13

EXHIBIT II

Inmate Signature: \_\_\_\_\_

SEP - 5 2013

TO: (Name and Title of Staff Member) WANDR MARTINEZ	DATE: 5-10-15
FROM: Taylor, Courtney, FITZGERA.	REGISTER NO.: 57155-053
WORK ASSIGNMENT: NA	UNIT: B2 4C

SUBJECT: (Briefly state your question or concern and the solution you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

YOU ARE IN VIOLATION OF THE AMERICANS WITH DISABILITIES ACT AND YOUR CONTRACTUAL OBLIGATION TO THE US GOVERNMENT TO PROVIDE APPROPRIATE MEDICAL CARE FOR THE INMATES IN YOUR CHARGE. I HAVE AN OPEN COLISTOMY AND IN SPITE OF HSA PAMELA NELSON'S STATEMENTS, I AM NOT BEING PROVIDED WITH THE APPROPRIATE SUPPLIES AND ATTENTION TO PROPERLY TREAT MY CONDITION. ON MORE THAN ONE OCCASION I HAVE BEEN FORCED TO TEAR-LIPS, THE SITE OF INJECTION WITH TAPE AND TOILET PAPER TO KEEP IT FROM LEAKING BODILY WASTE, A BIO-HAZARD TO MYSELF AND THE INMATE POPULATION AT LARGE. HAVE THE APPROPRIATE AND HAZARDOUS SITUATION CORRECTED IMMEDIATELY, AS NO DOUBT, SERIOUS HEALTH CONSEQUENCES ARE FORTHCOMING.

(Do not write below this line)

DISPOSITION:

Mr Taylor. You are scheduled at 0800 Monday, Tuesday 0800 and Wednesday 0800 to come shower in medical and pick up your supplies. You continually try to come more and at different times. Please try to stay on schedule. You have been evaluated by the physician and an off-site consultation request has been sent and is pending at this time.

Signature Staff Member P. Nelson, RN, HSA	Date 5-15-13
Record Copy - File; Copy - Inmate (This form may be replicated via WP)	This form replaces BP-148.070 dated Oct 86 and BP-5148.070 APR 94



EXHIBIT III



EXHIBIT IV

# REEVES COUNTY DETENTION CENTER III INMATE INFORMAL RESOLUTION FORM

Date: 2-24-14 Informal Resolution No. RV.S-14-18

From Taylor Courtney F BOP # 57155053 Unit B-24L  
Last, First, Middle

## Part A-Inmate Request (Solicitud De Interno)

For the past five months, I have been forced to shower with cold water, because the warden of RCDC-III, refuse to have hot water system install to the shower at the medical building, which is the only place with a shower available, that is close to being capable of facilitating (assisting) my needs; As a result of my medical condition being disabled with a full colostomy. Repeatedly I have complained the inhuman condition of the shower to staff to no avail. Therefore, herein I am again request hot water be install to the shower at medical. Thank You.

Date 2-24-14 Signature [Signature]

## Part B- Response (Repuesta)

Maintenance was advised of the problem the water is like warm. If you need the water to be hotter you can bathe in the unit & charge your bag in medical until the problem is resolved.

Is inmate satisfied with response YES/NO, provided by Staff?  
Circle One

Date Returned to Inmate

Unit Staff Signature: [Signature]

Inmate Signature: [Signature]

FEB 25 2014

EXHIBIT IV



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Return Receipt Fee (Endorsement Required)	2.70	
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 7.70	08/05/2014

Sent To: *Mr. Eric Holder*  
 Street, Apt. No., or PO Box No.: *950 Penn Ave. N.W.*  
 City, State, ZIP+4: *Wash, DC 20530*

PS Form 3800, August 2005 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No          If YES, enter delivery address below</p> <p><i>Eric Holder</i>  <b>AUG 11 2014</b></p>
<p>1. Article Addressed to:</p> <p><i>Off of Attorney General</i>  <i>Eric Holder</i>  <i>950 Pennsylvania Ave NW</i>  <i>Wash, DC 20530</i></p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail</p> <p><input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number          (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>PS Form 3811, February 2004</p>	<p>Domestic Return Receipt 102595-02-M-1540</p>

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 Total Postage & Fees \$ 7.64 63 08/05/2014

Sent To Christopher Clay C/O A.C.L.U.  
 Street, Apt. No., or PO Box No. 125 Broad St. 18th fl.  
 City, State, ZIP+4 New York, NY 10004

PS Form 3800, August 2005 See Reverse for instructions

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<p>■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>Christopher Clay  C/O A.C.L.U.  125 Broad St. 18th fl.  New York, NY 10004</p>	<p>Signature  American Civil Liberties Union  125 Broad St. 18th Floor  New York, NY 10004</p> <p>B. Received by (Printed Name)  EDILS</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes  If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number  (Transfer from service label)</p> <p>7014 0150 0001 6940 8064</p>	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7034 0150 0001 6940 8057

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OFFICIAL USE	
Postage	\$ 1.61
Certified Fee	3.30
Return Receipt Fee (Endorsement Required)	2.70
Restricted Delivery Fee (Endorsement Required)	—
Total Postage & Fees	\$ 7.61

Postmark Here  
AUG 2014  
19772-9998

Sent To: Charles E. Daniels Director of BOP  
 Street, Apt. No., or PO Box No. 320 First St. NW  
 City, State, ZIP+4 Wash DC 20534

PS Form 3800, August 2006 See Reverse for Instructions

Office Of Attorney General  
Hon. Eric Holder  
950 Pennsylvania Ave, NW  
Washington DC 20530

Courtney F. Taylor  
Reg. No. 57155-053  
R.C.D.C. III  
P.O. Box 2038  
Pecos, TX 79772

July 31, 2014

Dear Mr. Holder,

Good day to you and the rest of your hard working staff up there in the nation's capital. Sir, I am a native of Jamaica doing time for illegal re-entry at the Reeves County Detention Center III, located in Pecos, TX, leased by the Geo Group and contracted by the F.B.O.P. to house deportable inmates, like myself.

Sir, the reason for writing this letter is to let you know of the many injustices that's been metted out to not only me but to other inmates that have serious medical problems but have been ignored by not only staff but also my Warden Ricardo Martinez, a B.O.P. employee by the name of Mr. Jeremy Bryant and his boss Mr. John P. Yates who is in cohort with Geo and Reeves County. Please see document that I have enclosed about myself to support my claim and the names of some of the other inmates here who continue to suffer under these people. I have a colostomy and developed a hernia inside the said wound and been going through the most unbearable pain you could imagine but instead of getting me the treatment that I so require and was recommended by severa doctor's. I have been given nothing but pain medication that is of no help to me because they do not want to spend the money to take care of not only me but the rest of the seriously ill inmates that are housed here.

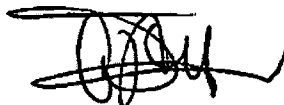
Sir, I am calling on you to do a quick investigation into these claims that I am making to you because the people continue to ignore U.S. Constitution and the rules and policies set forth by the F.B.O.P. Including not only Warden Martinez but many of his incompetent staff. Sir there are inmates here that cannot take care of themselves and the Warden and his staff have other inmates taking care of them and are paying them 12 cents an hour and these people are not medical personnel but regular inmates. Like myself instead of getting these people to the proper facility so they can be better taken care of. I will also include their names and the people who have been taking care of them. Sir, if you send your people from Washington to investigate these alligation that I am making, alot of inmates including myself who are not scared of retribution by staff will talk to them, as you should know alot of. Inmates have been put in the SHU and their good time has been taken away from them. Sir I was put on the transfer list around September of last year but after not seeing anything happening I inquired about said transfer but was given the run around by

Warden Martinez, so I spoke to Mr. Jeremy Bryant and Mr. John P. Yates but was told by them that someone higher than themselves in the B.O.P. has removed my paperwork and so my transfer is not possible but instead I would be sent to a specialist in Odessa, Texas and if he could perform the surgery that I need it would be done. On my first visit to the Texas Tech Medical Facility I was seen by a Doctor Salazar and to my surprise he told me I do not look like someone who needs surgery so I told this to H.S.A. and also to the Warden and B.O.P. officials and I was told not to worry as I will be sent to a different specialist but instead was sent to the same Dr. SALazar and was told by him the second time that I do not have insurance so he cannot do anything for me at that time. When I get released I could get insurance and come back and see him and he will be able to perform my surgery. All this effort was done to impress the B.O.P. auditors who came to this facility and after seeing my medical records was so upset from what I was told but after the auditors left, it was back to the same cruel punishment by these people. On more than one occasion I have passed out because of my situation but nothing has been done.

I am about to be released on Sept. 4, 2014 but I'm letting you be aware of what is taking place at this facility and callin on you to do whatever needs to be done to help the inmates that will still be here.

Sir, before I close my letter I just want to say "thank you" for for taking the time from your busy schedule to read this letter and may the Good Lord continue to Bless and keep you safe always.

Sincerely,

A handwritten signature in black ink, appearing to read 'Courtney F. Taylor', with a stylized flourish at the end.

Courtney F. Taylor  
BOP # 57155-053

Jamaican Embassay  
Ambassador Audrey P. Marks  
1520 New Hampshire Ave. N.W  
Washington DC 20036

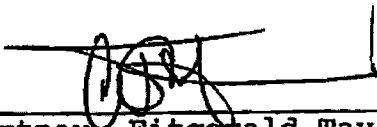
June 7, 2013

Dear Ambassador Marks:

My name is Courtney Fitzgerald Taylor, I am a Jamaican, citizen and currently a federal inmate scheduled for deportation back to Jamaica, in or on and about two years time. I, am currently being housed at a Federal Bureau of Prisons, private contract facility run by Geo Group inc., The Reeves County Detention Center III, located in Pecos Texas. I, write you today as a Jamaican citizen in a foreign land in dire need of what ever assistance you can provide me with acquiring the medical treatment I, desperately need but I, am being deliberately denied apparently due to corporate revenue concerns. In 2008, while living with my family in Phoenix, Arizona, I, suffered a gun shot wound to the abdomen as a result of me trying to stop a home invasion. As a result of that injury I, was left severely disabled with a full colostomy as well as extreme damage to the Urethra, requiring periodic visits to a Urologist. Since my arrival at RCDC III, on March 19, 2013, I, have been subjected to cruel and dehumanizing treatment that certainly would never be contemplated let alone tolerated as acceptable if it were not for the fact that I, am a Jamaican rather than American citizen. I, more often than not being forced to jere-trigg, my colostomy bags in order to stay the constant seepage of feces, because the staff at this facility refuses to buy the proper size bags. THis practice is both dehumanizing and an extreme health hazard to myself and others in my immediate area. I, have developed a Hernia at the incision site or Stolma, as a result of the colostomy not being reversed in a timely fashion also due to cost concerns. Theeffect of that delay thus far has been to force me to live in constant and at times debilitating pain. The same is true for the

denial of the required Urologist visits, as my Urethra has been closing making urination exteremly painful and close to impossible at times. Any assistance that you could provide me with theses unfortunate circumstances would be greatly appreciated as my conditions are steadily deteriorating. Thank you for taking the time to read my correspondence. I, hope to being hearing from you soon at the address listed below.

With kindest regards



---

Courtney Fitzgerald Taylor  
57155-053  
RCDC III  
P.O.B. 2038  
PECOS TX 79772-2038





EMBASSY OF JAMAICA  
1520 New Hampshire Avenue, NW  
Washington, DC 20036  
United States of America

Telephone: (202) 452-0660  
Facsimile: (202) 452-9392

2013 June 28<sup>th</sup>

Mr. Courtney F. Taylor  
57155-053  
Reeves County Detention Center III  
P.O. Box 2038  
Pecos, Texas 79772-2038

Dear Mr. Taylor

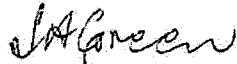
This serves to acknowledge receipt of your letter regarding lack of proper medical attention.

We have written to the warden of the facility, for him to have the issues addressed. A copy of the letter is attached.

It is hoped that the appropriate actions will be taken speedily.

Best wishes.

Yours truly

  
Stacy-Ann Green  
Security Attaché

Attachment



EMBASSY OF JAMAICA  
1520 New Hampshire Avenue, NW  
Washington, DC 20036  
United States of America

Telephone: (202) 452-0660  
Facsimile: (202) 452-9392

2013 June 28<sup>th</sup>

Mr. Ricardo Martinez  
Warden  
Reeves County Detention Center III  
100 W County Road, #204  
Pecos, Texas 79772

Dear Warden Martinez

**Re: Mr. Courtney Taylor – 57155-053**

I write to seek your assistance on behalf of Mr. Courtney Taylor, who claims to be Jamaican.

Mr. Taylor has reached out to us stating that he is having grave hardship arising from his medical condition, which he says has been compounded by the lack of proper medical attention. Reportedly, Mr. Taylor is disabled, has damage to his urethra and has had a colostomy. He complains of not being issued with the correct size colostomy bag, which results in seepage of his faeces. Further, he stated that the colostomy is not being reversed in a timely manner, adding to his ordeal. Reportedly, he also suffers urinary problems due to undue delay in scheduling of his visits to the urologist.

Your intervention in bringing this matter to a resolve, will be highly appreciated.

Yours truly

A handwritten signature in cursive script, appearing to read 'Stacy-Ann Green'.

Stacy-Ann Green  
Security Attaché

Jamaican Consulate  
Houston Texas

Dear Your Honorable Fulleren,

Good day to you, I am a Jamaican national presently incarcerated at Reeves III, in Pecos Texas, on federal re-entry conviction, and I am pending immigration removal proceedings at the expiration of my sentence on September 2014.

On April 2, 2014, an ICE agent interviewed me in regards to my immigration status, and I was informed that your office is in-charge of issuing travel documents for Jamaican citizens in the West Texas region, and thus is responsible for said issuance in my case. It is therefore the purpose of this letter to inform you about my situation.

Prior to said ICE interview, I was un-informed and unaware of a Jamaican Consulate Office here in Texas, and I have been in contact with our diplomatic representatives; the Honorable Vance Carter at our Miami Consulate Office, and the Honorable Stacy Ann Green, Security Attache to Your Excellency Audrey P. Marks, Ambassador of our Embassy in Washington, D.C., regarding inhumane treatment and denial of medical care to which I have been subjected and continue to face at Reeves III where I have been confined for the past 16 months.

To better familiarize you with my situation, enclosed here with this is a copy of my initial letter to Your Excellency Audrey P. Marks; and her letter to Warden Martinez. It is my understanding that no travel document will be issued in my case, unless the American Government, specifically the Federal Bureau of Prisons, uphold their international agreement and responsibility to provide me proper medical care - surgery, as it is ordered by medical professionals. Therefore, herein with all due respect; I request that you contact the Hon. Vance Carter and the Hon. Stacy Ann Green for clarity on this matter.

Additionally, please note that prison officials continue to sabotage the progress for my surgery, and apparently the aim is to delay and hinder it from happening, while the remainder of my sentence elapse; so that I will be deported without them having to foot the cost. This reality is conspicuous in a sequence of events following the Hon. Stacy Ann Green's letter to Warden Martinez.

After receipt of said letter, the prison medical staff started to provide me the proper size colostomy bags and better pain medication. Also I was told that my relocation to a BOP Medical Facility was being arranged, and about a month later that I was designated housing at one in North Carolina, and would be transferred there soon as possible. But several months passed without any progress in that regards, and when I inquired as to the cause; I was told another story, that I am being re-designated to a better BOP facility, I had an opportunity to complain my frustration to BOP official whom was on tour at Reeves III during that period, and he claimed that someone at the BOP regional office mishandled my paperwork, and that more information is needed. Approximately one

month later, again I was told another story; that the BOP have agreed to allow Reeves III to arrange with an outside (public) Medical facility to conduct the operation.

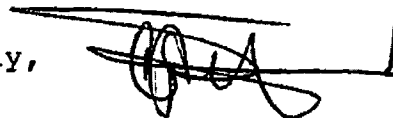
On February 19, 2014, I met with one Dr. Salazar, at Texas Tech Medical Facility, for what was told to me by the medical staff at Reeves III, was going to be an evaluation for the colostomy surgery. But the doctor said he was not requested to examine me for that surgery, and that there weren't any written report in my medical records presented to him about it. Dr. Salazar told me that my meeting with him was only to evaluate me for a possible hernia surgery. And at the examination he stated to me that if I am experiencing pain then I need to have the surgery because that is an emergency, but if not I can wait til I am released from prison. However, I found the doctor's comments to be strange. Because I have been suffering pain for more than two years now, and has been taking prescribed pain medication; currently Trymadol. Thus my medical records in the doctor's possession should have shown that reality.

I have since being told at the BOP contracted Reeves III, that I am scheduled for another outside doctor's appointment pertaining to the ordered colostomy surgery, however I have yet to go. And several days ago Warden Martinez gave me a sarcastic response when I asked him about the surgery; he replied by asking me how much time is remaining on my sentence, and when answered five months, he smiled and said, "I'll see you in Jamaica."

I have suffered tremendously for the past two years, at the hands of the Federal Bureau of Prisons and its private contractors; rights to which I am lawfully entitled under the U.S. Constitution and the international agreements of nations have been violated; and now to be deported in my badly ill condition, to suffer more should not be acceptable by you, my diplomatic representatives. Furthermore, I have obtained professional legal representation to assist me dealing with the denial of adequate medical care to which I have been subjected.

Your service to our nation and this very important matter is very much appreciated and I anticipate to hear from you in the very near future.

Yours Truly,



Courtney Taylor

cc: The Hon. Stacy Ann Green  
The Hon. Vance Carter  
File.

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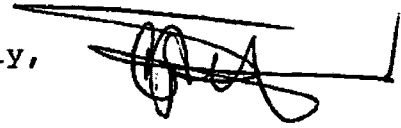
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Yours Truly,



Courtney Taylor

cc: The Hon. Stacy Ann Green  
The Hon. Vance Carter  
File.



IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS.

COURTNEY FITZGERALD TAYLOR,

CASE NO. 7-14-CV-69

PLAINTIFF,

V

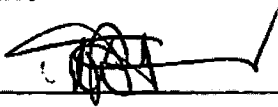
G.E.O.GROUP INC, RICARDO MARTINEZ,  
GEORGE ZOLEY, RICHARD GLANTON,  
CLARENCE ANTONY, ANNE NEWMAN,  
NORMAN CARLSON, CHRISTOPHER WHEELER  
ET, ALA.

DEFENDANTS.

CIVIL ACTION COMPLAINT

PROOF OF SERVICE

I COURTNEY FITZGERALD TAYLOR DO CERTIFY THAT ON THIS 28 DAY OF  
AUGUST 2014, PURSUANT TO FEDERAL COURT RULES OF SERVICE PROCESS, I  
HAVE SERVED THE ATTACHED MOTION FOR LEAVE TO PROCEED IN FORMA  
PAUPERIS AND CIVIL COMPLAINT TO THE CLERK OF THE UNITED STATES  
FEDERAL DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS. 655 E.  
DURANGO BOULEVARD. SAN ANTONIO, TEXAS. 78206. BY DEPOSITING AN ENV\_  
ELOPE CONTAINING THE ABOVE DOCUMENTS IN THE PRISON LEGAL MAIL  
SYSTEM.

  
COURTNEY FITZGERALD TAYLOR IN PRO SE  
BUREAU OF PRISON REG# 57155-053  
C/O TASHANNA TAYLOR  
749 WILLIAMS AVE. APT#3  
BROOKLYN, NEW YORK. 11207.

OFFICE OF THE CLERK OF THE COURT  
U.S. FEDERAL DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS.  
655 E DURANGO BOULEVARD  
SAN ANTONIO, TEXAS. 78206.

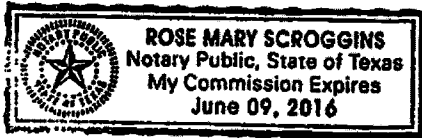


State of Texas

County of REEVES

Before me, a Notary Public, on this day personally appeared Courtney Fitzgerald Taylor  
known to me by RCRTH ID Card 57105-053 to be the person whose name is subscribed to  
the foregoing instrument and acknowledged to me that he executed the same for the purpose and  
consideration therein expressed.

Given under my hand and seal of office this 28<sup>th</sup> day of Aug 2014.



Rose Mary Scroggins  
Notary Public, State of Texas

My commission expires the 09 day of June, 2016.

Courtney Taylor #A 095-965-036

Pro Processing Center SSU.

8915 Montana Ave

El Paso Texas. 79925

OFFICE OF THE CLERK OF THE COURT  
U.S. FEDERAL DISTRICT COURT  
THE WESTERN DISTRICT OF TEXAS.  
655 E. DURANGO BOULEVARD,  
SAN ANTONIO, TEXAS. 78206.



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FROM: Courtney Taylor #095-965-036  
96 Processing Center,  
8915 Montana Ave.

U.S. District Court  
655 E. Orange Boulevard  
San Antonio, Texas 78206

Label 228, July 2013

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W. O.

Case 4:15-cv-00060 Document 1-1 Filed 03/22/14 Page 33 of 34

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